

**IN THE UNITED STATES COURT
FOR THE FEDERAL DISTRICT OF NEW JERSEY**

United States of America	:	CR#24-551
	:	
v.	:	
	:	
Hasaan Savery	:	21 U.S.C. §841(a) and (b)(1)(c)
	:	18 U.S.C. §922(g)(1)

MOTION FOR MENTAL HEALTH EXAMINATION
PURSUANT TO 18 §4241

**TO THE HONORABLE RENEE BUMB, JUDGE OF THE UNITED
STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY:**

AND NOW comes the defendant Hasaan Savery, by and through his attorney Thomas F. Burke, Esquire, who hereby avers the following facts and requests the following relief:

1. In November of 2023, the defendant Hassan Savery was arrested and charged by way of a complaint with violations of 21 USC §841(a) and (b)(1)(c) and 18 USC §922(g)(1).
2. The defendant Hassan Savery was originally represented by James Maguire Esq. of the Federal Defender's Association.
3. This Court appointed your undesignated counsel via the CJA Act to represent the defendant on May 13, 2025.
4. Your undersigned counsel has received and reviewed the discovery materials provided by the government including police reports, criminal history record and body-cam videos.

5. Your undersigned counsel has had several conversations with previous counsel regarding the history and procedure of the case, particularly the previously litigated motion to suppress physical evidence.
6. Your undersigned counsel has had multiple conversations with AUSA Andrew D'Aversa regarding possible plea negotiations.
7. Your undersigned counsel has met with Mr. Savery three times at the Federal Detention Center to discuss the facts of his case, the procedural posture, and has explained in detail both taking the matter to trial as well as pleading guilty.
8. Based on your undersigned counsel's lengthy conversations with Mr. Savery, it is believed that Mr. Savery is suffering from a mental defect that prevents him from fully understanding his predicament, and prevents him from making an informed decision on how to proceed with his case.
9. Accordingly, your undersigned counsel respectfully requests this Court order a mental competency examination pursuant to 18 USC §4241.
10. It is also requested that this Court set a hearing on the matter consistent with this Court's calendar.
11. Your undersigned counsel has discussed this Motion with AUSA Andrew D'Aversa.

WHEREFORE, it is respectfully requested that this Court GRANT the Motion and Order a mental competency examination of the defendant Hasaan Savery pursuant to 18 U.S.C. §4241

Respectfully submitted,

/s/ *Thomas F. Burke, Esquire*

Thomas F. Burke, Esquire
Counsel to Hasaan Savery

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ORDER

AND NOW, this _____ day of July, 2024, it is hereby Ordered,
pursuant to 18 U.S.C. §4241, that the defendant Hasaan Savery is to undergo a mental
competency evaluation.

BY THE COURT:

J.